

Exhibit A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMIT PATEL, on behalf of himself and all others
similarly situated,

Plaintiff,

v.

TRANS UNION, LLC in its own name and
t/a TRANS UNION RENTAL
SCREENING SOLUTIONS, INC. and
TRANSUNION BACKGROUND DATA
SOLUTIONS, and TRANS UNION RENTAL
SCREENING SOLUTIONS, INC. in its own
name and t/a TRANSUNION BACKGROUND
DATA SOLUTIONS,

Defendants.

Case No. 3:14-cv-00522-LB

DECLARATION OF RSM US LLP
IN CONNECTION WITH NOTICE DISSEMINATION

I, Risa Neiman, declare under penalty of perjury as follows:

1. I am an employee of RSM US LLP which was appointed to aid in giving notice to potential Class Members and I was principally responsible for overseeing the dissemination of notice to members of the Class and Subclass.

2. Pursuant to the signed Order Certifying the Class dated June 26, 2015, a class action was preliminarily certified on behalf of the following class of plaintiffs:

All natural persons residing on the United States who, from February 2012 until December 2013, were the subject of Trans Union Rental Screening Solutions SmartMove reports containing at least one item of "Alert List" information.

The Court also certified a Subclass of consumers consisting of:

All natural persons residing on the United States who, from February 2012 until December 2013, were the subject of Trans Union Rental Screening Solutions SmartMove reports containing at least one item of "Alert List" information who requested a file disclosure from, and were sent a disclosure by, Trans Union LLC.

Initial Notice Mailing

3. On November 25, 2016, we were provided with a mailing list containing a total of 10,505 names and addresses. We identified 4 exact duplicates and these records were removed from the list. This list was then processed through the United States Postal Service National Change of Address database.

4. Pursuant to the Order, a mailing was made of the attached Notice marked "Exhibit A" to the 10,501 persons with valid addresses on December 1, 2016, via U.S. First Class Mail.

Undeliverable Notices

5. As of the close of business on June 6, 2017, we have received 2,043 Notice Packages returned by the U.S. Postal Service as undeliverable.

a.) 2,027 Notices have been returned without a forwarding address. Using the search firms Accurant, a LexisNexis address search service and TLO, a TransUnion address search firm, we were able to locate 1,849 new addresses. Notices were re-mailed to these 1,849 class members.

b.) 16 Notices were returned with a forwarding address and they were re-mailed to the updated addresses.

6. In summary, the total number of Notices that were presumed to be successfully delivered are as follows:

Total Notices mailed		10,501	
Less: Notices returned undeliverable	(2,043)		
Notices re-mailed from search effort	1,849		
Notices re-mailed to forwarding addresses	16		
Notices returned again undeliverable	(243)	(421)	
Total Notices presumed delivered		10,080	96%

Exclusion Requests

7. As of August 14, 2017, we have received requests from two individuals to be excluded from the Class. Copies of these exclusion requests are attached as "Exhibit B".

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct, executed on August 14, 2017 in Blue Bell, PA.


Risa Neiman

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AMIT PATEL, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

TRANSUNION, LLC in its own name and
t/a TRANSUNION RENTAL SCREENING
SOLUTIONS, INC. and TRANSUNION
BACKGROUND DATA SOLUTIONS, and
TRANSUNION RENTAL SCREENING
SOLUTIONS, INC. in its own name and t/a
TRANSUNION BACKGROUND DATA
SOLUTIONS,

Defendants.

Case No. 3:14-cv-00522-LB

JOINT PROPOSED FORM OF NOTICE TO
THE CLASS

YOU ARE A MEMBER OF A CLASS ACTION
DO NOT THROW THIS AWAY. THIS IS NOT JUNKMAIL OR AN AD.
YOU COULD LOSE RIGHTS OR BENEFITS

Dear Mr/Ms.:

I write to you because you are a member of a class action in the case referenced above. I am one of the lawyers involved in the case and want to explain what the case is about and why you are in it. Please just take a few minutes to just review this notice as it may affect your rights to receive benefits, and it will explain what you need to know.

We do not expect that you know the plaintiff Mr. Amit Patel and may not even recall the name of the Defendants TransUnion LLC and TransUnion Rental Screening Solutions, Inc. (collectively "Defendants"). However, Defendants' records indicate that you are a member of the following Class certified by the Court:

All natural persons residing in the United States who, from February 2012 until December 2013, were the subject of TransUnion Rental Screening Solutions SmartMove reports containing at least one item of "Alert List" information.

The Court also certified a Subclass of consumers consisting of:

All natural persons residing in the United States who, from February 2012 until December 2013, were the subject of TransUnion Rental Screening Solutions SmartMove reports containing at least one item of "Alert List" information who requested a file disclosure from, and were sent a disclosure by, TransUnion LLC.

Because you are a member of the Class and may be a member of the Subclass, you have a legal claim or claims and that's why we are writing to you. There are some other things you need to know which we have outlined below. If at any time after reading this notice you still have questions or want to discuss what this notice means, you can get more information by visiting the website www.pateltransunionclassaction.com or calling one of the lawyers' offices free of charge.

There has been no money or benefit recovered to date, and there is no guarantee that there will be money or a benefit available in the future. However, the Court did grant a motion certifying the above Class, and *you have a choice to make now.*

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

DO NOTHING	<p>Stay in this lawsuit. Await the outcome. Give up certain rights.</p> <p>By doing nothing, you keep the possibility of getting money or benefits that may come from a trial on liability and damages or a settlement. But, you give up any rights to sue Defendants individually and to seek damages for the same legal claims that are in this lawsuit. Similarly, if you do nothing and Defendants win a trial on damages, you will lose your claims covered by this lawsuit.</p>
ASK TO BE EXCLUDED	<p>Remove yourself from this class action. Get no benefits or money. Keep certain rights.</p> <p>If you ask to be excluded and money or benefits are awarded later, you will not share in such recovery. But, you keep any rights you may have to sue Defendants separately about the same legal claims that are in this lawsuit.</p>

- Your options are explained in this notice. To ask to be excluded, you must act before January 30, 2017.
- The Plaintiff and his lawyers must prove the claims against the Defendants at trial. If money or benefits are obtained from the Defendants, you will be notified about how to obtain your share.
- Any questions? Read on and/or visit www.pateltransunionclassaction.com or call 1-877-735-8600.

BASIC INFORMATION

1. Why did I get this letter?

This letter was sent to you because sometime in 2012 or 2013, a consumer reporting agency called TransUnion Rental Screening Solutions, Inc. sold a consumer report called a “SmartMove” report about you to a landlord in connection with your application to rent an apartment. The report TransUnion Rental Screening Solutions sold about you contained an item of “Alert List” information. “Alert List” information comes from federal law enforcement databases such as the FBI and Secret Service, the Office of Foreign Assets Control Database of terrorists and drug traffickers, and other domestic and international government watch lists.

If you asked TransUnion LLC for a copy of your consumer file, more commonly called a “credit report,” sometime in 2012 or 2013, you are a member of the Subclass and have an additional claim, because TransUnion LLC did not include “Alert List” information from the SmartMove report in the response it sent to your request.

This letter explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you. You have legal rights and options that you may exercise before the Court holds a trial on damages. The trial is to decide whether TransUnion LLC and/or its subsidiary TransUnion Rental Screening Solutions, is liable for willfully violating the Fair Credit Reporting Act, the amount of statutory damages between \$100-\$1,000 per class member, plus punitive damages, if any, to be assessed against Defendants. Judge Laurel Beeler of the United States District Court for the Northern District of California is overseeing this class action. The lawsuit is known as *Patel v. TransUnion, LLC*, Civil Action No. 3:14-cv-522-LB (N.D. Cal.).

2. What is this lawsuit about?

There are two claims in the case.

The first claim, which is the same for everyone in the Class, is that the procedures Defendants used to associate consumers with “Alert List” information were inadequate, and resulted in Defendants erroneously identifying consumers as being part of a government watch list when they were not. Specifically, the claim is

that Defendants' procedures violated a federal law called the Fair Credit Reporting Act, by failing to maintain reasonable procedures to assure the "maximum possible accuracy" of the information they associated with consumers.

The second claim, which applies only to members of the Subclass, is that TransUnion LLC failed to include the "Alert List" information in its response to requests for information, in violation of another part of the Fair Credit Reporting Act.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called the "Class Representative," in this case Amit Patel, sue on behalf of other people who have similar claims. In essence, the Class Representative is the leader or "face" of the Class. All of the people together are called a "Class" or "Class Members." Mr. Patel is also called the Plaintiff and the Class Representative and he is pursuing the above claims on behalf of the Class and Subclass. The consumer reporting agencies he sued, TransUnion LLC and TransUnion Rental Screening Solutions, Inc., are called the Defendants. One court resolves the issues for everyone in the Class and Subclass, except for those people who choose to exclude themselves from the Class and Subclass.

4. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action and move towards a trial because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts. Specifically, the Court found that:

- There are thousands of persons about whom TransUnion Rental Screening Solutions sold SmartMove reports containing Alert List information, and a substantial number who also asked TransUnion LLC for a copy of their file in 2012 or 2013;
- There are legal questions and facts that are common to each of them;
- The claims of Plaintiff Amit Patel are typical of the claims of the rest of the Class and Subclass;
- Mr. Patel and the attorneys representing the Class will fairly and adequately represent the interests of the Class;
- The common legal questions and facts are more important than questions that affect only individuals; and
- This class action will be more efficient than having many individual lawsuits.

More information about why the Court is allowing this lawsuit to be a class action is in the Court's Order certifying the Class, which is available at www.pateltransunionclassaction.com.

THE CLAIMS IN THE LAWSUIT

5. What does the lawsuit complain about?

In the lawsuit, Plaintiff claims that Defendants violated the Fair Credit Reporting Act and as described in section 2 above. You can read the Plaintiff's full Complaint at www.pateltransunionclassaction.com.

6. How did Defendants answer?

Defendants denied that they violated any laws. Defendants' Answers to the Complaint are also at the same website.

7. Has the Court decided who is right?

The Court has not yet decided whether the Defendants have violated the law.

8. What is the Plaintiff asking for?

The Plaintiff will ask the Court to award money, known as statutory damages, of \$100 to \$1,000, to each member of the Class and Subclass for each claim. Plaintiff will also ask the Court to order Defendants to pay punitive damages.

9. Is there any money available now?

No money or benefits are available now because the Court has not yet decided whether or how much Defendants should pay the Class and Subclass in damages. There is no guarantee that money or benefits will ever be obtained. If they are, you will be notified about how to get a share.

YOUR RIGHTS AND OPTIONS

You have to decide whether to stay in the Class (do nothing right now) or ask to be excluded before the trial. You have until January 30, 2017, to exclude yourself.

10. What happens if I do nothing at all?

You don't have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit. **By doing nothing you stay in the Class.** If you stay in the Class and the Plaintiff obtains money or benefits, either as a result of the trial or a settlement, you will be notified about how to apply for a share (or how to ask to be excluded from any settlement). Keep in mind that if you do nothing now, regardless of whether the Plaintiff wins or loses the trial, you will not be able to sue, or continue to sue, Defendants about the same legal claims that are the subject of this lawsuit. You will also be legally bound by all of the Orders the Court issues and judgments the Court makes in this class action.

11. Why would I ask to be excluded?

If you already have a lawsuit against the Defendants for similar claims and want to continue with it, you need to ask to be excluded from the Class. If you exclude yourself from the Class – which also means to remove yourself from the Class, and is sometimes called “opting-out” of the Class – you will not get any money or benefits from this lawsuit even if the Plaintiff wins damages at trial or there is a settlement (that may or may not be reached) between Defendants and the Plaintiff. However, you may then be able to sue or continue to sue Defendants on your own. If you exclude yourself, you will not be legally bound by the Court's judgments in this class action.

If you start your own lawsuit against Defendants after you exclude yourself, you'll have to seek damages in court, and you may have to hire and pay your own lawyer for that lawsuit. If you do exclude yourself so you can start your own lawsuit against Defendants, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations or other time-sensitive requirements.

12. How do I ask the Court to exclude me from the Class?

To ask to be excluded, you must send an “Opt-Out Request” in the form of a letter sent by U.S. Mail, facsimile or e-mail stating that you want to be excluded from *Patel v. TransUnion, et al.* Instructions on submitting a request to opt-out are also on the class action website, www.pateltransunionclassaction.com. On the website you will also find a copy of a sample letter that you may use as a template to request to be excluded from *Patel v. TransUnion, et al.* Be sure to include your name, address, and telephone number, and sign the letter. You must mail your Opt-Out Request postmarked or time-stamped by January 30, 2017, to: *Patel v. TransUnion* Opt-Outs, P.O. Box 1387, Blue Bell, PA 19422, or fax the letter to (215) 641-8680 or e-mail your request to questions@pateltransunionclassaction.com.

THE ATTORNEYS REPRESENTING YOU

13. Do I have an attorney in this case?

The Court has certified the law firms of Francis & Mailman, P.C. and Evans Law Firm, Inc. as Class Counsel. The law firms and the attorneys are called “Class Counsel” and the contact information is as follows:

FRANCIS & MAILMAN, P.C.

100 S. Broad Street, 19th Floor
Philadelphia, PA 19110
(215) 735-8600
www.consumerlawfirm.com

EVANS LAW FIRM, INC.

3053 Fillmore Street, #236
San Francisco, CA 94123
(415) 441-8669
www.evanslaw.com

14. Should I get my own attorney?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you may retain one. For example, you can ask him or her to appear in Court for you if you want someone other than Class Counsel to speak for you.

15. How will the attorneys be paid?

If Class Counsel get money or benefits for the Class, they may ask the Court for fees and expenses. You won't have to pay these fees and expenses. If the Court grants Class Counsel's request, the fees and expenses would either be deducted from any money obtained for the Class or paid separately by Defendants.

THE TRIAL

16. When is the trial?

The trial is currently scheduled for November 6, 2017. Note that trial dates are sometimes rescheduled. You may obtain more information about the trial date at www.pateltransunionclassaction.com.

17. Do I have to come to the trial?

You do not need to attend the trial. Class Counsel will present the case for the Plaintiff and the Class, and Defendants will present their defenses. You or your own lawyer are welcome to attend at your own expense.

18. Will I get money after the trial?

If at some point the Plaintiff obtains money or benefits as a result of the trial or a settlement, and you did not exclude yourself from the Class, you will be notified about how to participate. We do not know how long this will take.

GETTING MORE INFORMATION

19. Are more details available?

Visit the website, www.pateltransunionclassaction.com where you will find the Court's Order certifying the Class, Plaintiff's Class Action Complaint, the Defendants' Answers to the Complaint, as well as information about how to exclude yourself as a Class member. You may also speak to one of the attorneys working on this class action by calling: 1-877-735-8600 or e-mailing at the following address: info@consumerlawfirm.com.

Patel v. TransUnion
c/o Settlement Administrator
P.O. Box 1387
Blue Bell, PA 19422

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE PAID
SCRANTON, PA
PERMIT # 384

IMPORTANT LEGAL INFORMATION



First Name M.I. Last Name
Street Address 1
Street Address 2
City, ST Zip Code

Exhibit B

REDACTED VERSION OF
DOCUMENTS SOUGHT TO BE SEALED



FINAL EXCLUSION LIST - 2 CLASS MEMBERS

Ref Number	First Name	Middle Name	Last Name
618	REDACTED		
7979	REDACTED		

REDACTED VERSION OF
DOCUMENTS SOUGHT TO
BE SEALED